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From: JABerryCG@aol.com

To: Chessoffice@aol.com, randybauer2300@yahoo.com, joel@channingcorporation.com,
randallhough@yahoo.com, SusanPolgar@aol.com, Paultruong@aol.com, bhall@uschess.org,
confidential@uschess.org

Date: Thu, 18 Oct 2007 19:37:32 EDT

Subject: Jim Berry votes on....Internet Counsel

In a message dated 10/18/2007 2:07:56 PM Central Daylight Time, Chessoffice writes:

In a message dated 10/18/2007 1:57:38 P.M. Eastern Daylight Time, randybauer2300@yahoo.com writes:

Legend about on how on the chess with Karl Kramnik...this morning and have...important...I think...the...
[REDACTED]

determined that it was a rival who was behind the supposed non-profit organization, went back to court, had the evidence unsealed.... and the defendant immediately settled. He's also had some "big Usenet clients," some of which were civil and some of which were criminal proceedings.

He bills at \$425 an hour, and other attorneys in his firm bill at \$220-425 an hour. Matt Thompson, who is his primary back-up, bills at \$245 an hour, and he indicated that the blended rate for their services would probably be in the upper \$200s to low \$300s an hour. They would want a \$5,000 refundable deposit which they would bill

Lieberman'; 'Randy Hough'; 'Susan Polgar'

Subject: RE: FW: Next Steps on Internet Counsel

Kronenberg carries \$1 million professional liability insurance. That is the same level as carried by United Forensics. I am not sure what the USCF carries, but it should seem to be sufficient among the three for this endeavor. Let's keep in mind that any acts of the USCF prior to our hiring counsel or the independent expert are our responsibility alone. Given the stature of these firms, I am satisfied that, going forward, the \$2 million plus our USCF coverage is reasonable.

Joel Channing <joel@channingcorporation.com> wrote:

discussion amongst the Board so that they are as "up to speed as possible." This will also give them "the other side of the story," so to speak, at least as far as it has been presented in our EB email discussions.

Randy

Joel Channing <joel@channingcorporation.com> wrote:

Dear Randy, I agree with you with the following caveats:

1. I didn't see anything about Kronenberger Burgoyne's professional liability insurance in any of your emails in my file. If you don't already know would you please find out how much they have?
2. If you have already discussed with Kronenberger Burgoyne the advisability of their hiring the Internet

From: Randy Bauer [mailto:randybauer2300@yahoo.com]

Sent: Friday, October 19, 2007 12:11 AM

To: DavidKusner@real.com; scott.deal@cheesecakeconnection.com; Clayton@cheesecakeconnection.com; RandyBauer2300@yahoo.com

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



December 2, 2008


VIA FACSIMILE AND U.S. MAIL


Karl S. Kronenberger, Esq.
KRONENBERGER BURGOYNE LLP
150 Post Street, Suite 520
San Francisco, CA 94108-4707


Re: *United States of America Chess Federation v. Susan Polgar*
USDC, Northern District of California Court Case No. 3:08-cv-05126-MHP
DEMAND FOR INDEMNIFICATION PURSUANT TO USCF BY-LAWS.


Karl S. Kronenberger, Es.
December 2, 2008
Page 2


You have not been appointed as "independent legal counsel" to advise the USCF or provide a written opinion concerning the determination required under Section 12 of the USCF's by-laws. And you cannot serve as independent counsel to advise the USCF in regards to Ms. Polgar's indemnification for several reasons, including, but not limited to, the fact that you are (1) presently legal counsel for the USCF in this action and thus




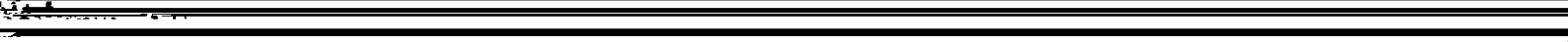


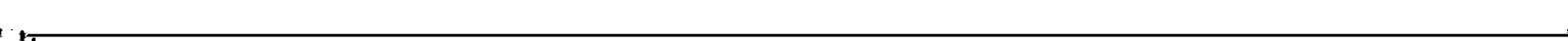












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From: Whitney Leigh <wleigh@gonzalezleigh.com>
Date: Fri, 5 Dec 2008 09:05:39 -0800
To: Karl Kronenberger <karl@kronenbergerlaw.com>
Cc: Matt Gonzalez <mgonzalez@gonzalezleigh.com>, Bryan Vereschagin
<bvereschagin@gonzalezleigh.com>, Matt Springman <mspringman@gonzalezleigh.com>

Notably, you have not responded to our November 14, 2008 letter, which requested information that (1) is necessary to resolve the issue of the scope of your representation and whether your representation presents an impermissible conflict of interest and (2) Ms. Polgar unquestionably is entitled to as an Executive Board member of the USCF. We will seek an order from the Court requiring the USCF to produce the requested information and suspend any on the USCF from conducting

[REDACTED]

[REDACTED]

[REDACTED]

----- Forwarded Message

From: Whitney Leigh <wleigh@gonzalezleigh.com>

Date: Mon, 23 Mar 2009 21:38:12 -0700

To: Karl Kronenberger <karl@kronenbergerlaw.com>, <jeff@kbinternetlaw.com>

Cc: Matt Springman <mspringman@gonzalezleigh.com>

Conversation: Indemnification USCF v. Polgar, N. D. Cal. 3:08-cv-05126 MHP

Subject: RE: Indemnification USCF v. Polgar, N. D. Cal. 3:08-cv-05126 MHP

Please provide to me no later than the close of business tomorrow. March

San Francisco, CA 94105
(415) 512-2000
(415) 512-2001 (facsimile)

From: Karl Kronenberger [<mailto:karl@kronenbergerlaw.com>]
Sent: Thursday, December 04, 2008 6:12 PM
To: Whitney Leigh
Subject: Indemnification

Whitney:

I received your fax today.

In accordance with Cal. Rule of Professional Conduct Rule 2-100, please send all correspondence on the indemnification matter to me, and not to my client, until further notice.

Best regards,

Karl

Karl S. Kronenberger
KRONENBERGER BURGOYNE, LLP
150 Post Street, Suite 520
San Francisco, CA 94108-4707
(415) 955-1155 x-114

From: Karl Kronenberger [Karl@KBInternetLaw.com]
Sent: Wednesday, March 25, 2009 12:34 PM
To: Whitney Leigh; Jeff Rosenfeld

Whitney Leigh
G. Whitney Leigh
Gonzalez & Leigh LLP
Two Shaw Alley, 3rd Floor
San Francisco, CA 94105
(415) 512-2000
(415) 512-2001 (facsimile)

From: Whitney Leigh
Sent: Monday, March 23, 2009 9:38 PM
To: 'Karl Kronenberger'; 'jeff@kbinternetlaw.com'
Cc: Matt Springman
Subject: RE: Indemnification USCF v. Polgar, N. D. Cal. 3:08-cv-05126 MHP

Karl: I write regarding Ms. Polgar's outstanding request for indemnification by the USCF for the legal fees and costs she has incurred in this matter. I am directing this correspondence to you because you previously demanded that I do so pursuant to Rule

[REDACTED]

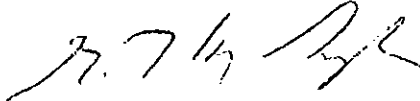
David A. Herman, Esq.
April 16, 2009
Page 2

We are concerned that the USCF has failed to comply with the provisions of its by-laws that pertain to her indemnification requests, to put it mildly. I enclose a copy of those by-laws with this letter. For Ms. Polgar and the USCF, the circumstances surrounding

courtesy.

Very truly yours,

GONZALEZ & LEIGH, LLP



G. Whitney Leigh

GWL:lr
Enclosures
cc: Karl S. Kronenberger, Esq.

GIFFIN, WINNING, COHEN & BODEWES, P.C.

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JAMES E. O'NEAL
OF COUNSEL

April 17, 2009

APR-22-2009 14:23

P.02/02

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